

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

THOMAS R. GANUS,)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 3:18-cv-00928-RLM-JEM
)	
KIMBERLY CREASY, et al.,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR INITIAL EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendants, Kimberly Creasy and Erin Jones, by counsel, Deputy Attorney General Ryan Guillory, respectfully move the Court for an initial extension of time of 28 days to respond to the Complaint filed in this matter. In support of said Motion, Defendants state as follows:

1. On April 5, 2019, the Clerk issued a Notice of Lawsuit and Request to Waive Service of Summons to Defendants, which provided Defendants with 60 days to respond to the Complaint in this matter. [ECF 11.]
2. Defendants' response to the Complaint is due June 4, 2019.
3. The deadline for Defendants to respond to the Complaint has not previously been extended.
4. Defendants' requested extension is for 28 days, to and including July 2, 2019,
5. This extension is needed in order for the undersigned to investigate and prepare a response to the allegations contained within the Plaintiff's Complaint. The requested extension will not interfere with any currently pending deadlines in this case.
6. Counsel for Defendants is unable to discuss the requested extension of time with the

Plaintiff, due to his current incarceration.

WHEREFORE, Defendants, Kimberly Creasy and Erin Jones, by counsel, respectfully move the Court for an initial extension of time of 28 days to respond to the Plaintiff's Complaint, up to and including July 2, 2019, and for all other just and proper relief.

Respectfully submitted,

CURTIS T. HILL, Jr.
Attorney General of Indiana
Atty. No. 13999-20

By: Ryan J. Guillory
Deputy Attorney General
Atty. No. 27857-53

CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2019, a copy of the foregoing was served upon the individual listed below, by United States mail, first-class postage prepaid:

Thomas R. Ganus
DOC # 111462
Indiana State Prison - ISO
201 Woodlawn Avenue
Michigan City, IN 46360

Ryan J. Guillory
Deputy Attorney General

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